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12 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC, and OTTO TRUCKING LLC

16 || WAYMO LLC.

Case No. 3:17-cv-00939-WHA

17 Plaintiff.

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19 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

**DECLARATION OF WENDY J. RAY
IN SUPPORT OF UBER
TECHNOLOGIES, INC.,
OTTOMOTTO LLC, AND OTTO
TRUCKING LLC'S
ADMINISTRATIVE MOTION TO
ALLOW SAMEER KSHIRSAGAR
ACCESS TO CERTAIN MATERIAL**

Complaint Filed: February 23, 2017
First Am. Compl. Filed: March 10, 2017
Trial Date: October 2, 2017

I, Wendy J. Ray, declare as follows:

1. I am a partner with the law firm of Morrison & Foerster LLP. I am a member in good standing of the Bar of the State of California. I make this declaration based on personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein. I make this declaration in support of Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC's (collectively "Uber") Administrative Motion to Allow Sameer Kshirsagar Access to Certain Material.

2. Attached hereto as Exhibit 1 is a true and correct copy of an email chain between Arturo González and counsel for Waymo LLC (“Waymo”) at Quinn Emanuel dated March 20, 2017, at 11:26 a.m. requesting that counsel for Waymo agree to allow counsel for Uber to show Mr. Kshirsagar the five files Waymo alleges he downloaded.

3. On March 20, 2017, at 2:00 p.m., I met and conferred telephonically with counsel for Waymo. I again requested that counsel for Waymo agree to allow counsel for Uber to show Mr. Kshirsagar the files at issue. Counsel for Waymo did not agree to my request at that time.

4. Attached hereto as Exhibit 2 is a true and correct copy of an email chain between Arturo González and counsel for Waymo. On March 21, 2017, Arturo González again asked counsel for Waymo if they would agree to allow counsel for Uber to show Mr. Kshirsagar the five files Waymo alleges he downloaded. On March 22, 2017, Arturo González requested that counsel for Waymo agree to allow counsel for Uber to show Mr. Kshirsagar the transition memorandum he prepared when he departed from Waymo. Waymo has not responded.

5. Attached hereto as Exhibit 3 is a true and correct copy of Exhibit A to Patent Local Rule 2-2 Interim Model Protective Order that currently applies in this case, executed by Sameer Kshirsagar.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 23rd day of March, 2017, in Los Angeles, California

/s/ Wendy J. Ray

Wendy J. Ray

ATTESTATION

I, Arturo J. González, am the ECF User whose ID and Password are being used to file this document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Wendy J. Ray concurs in this filing.

5 || Dated: March 23, 2017

MORRISON & FOERSTER LLP

By: /s/ Arturo J. González
ARTURO J. GONZÁLEZ